



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII

899 18th STREET - SUITE 800
DENVER, COLORADO 80202-2400

JUL 11 1997

Ref: 8KFR-F

Mr. Steve Slaten
Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, CO 80402-0928Re: Modification to OU 2 Surface Water IM/IRA
(Draft Mound Site Plume Decision Document and Administrative
Transfers)

Dear Mr. Slaten:

EPA has reviewed the draft Mound Site Plume Decision Document and the Administrative Transfer attachment which comprise the major modification to the OU 2 Surface Water Interim Measure/Interim Remedial Action. In general, EPA supports this modification and the proposed remedial action that is designed to passively collect and treat contaminated groundwater so that down gradient surface water will be protected. The following comments delineate items for improvement, revision or reconsideration in the decision document.

General Comments

Much data has been gathered in the past year to better characterize the geology, hydrogeology and location of contaminants in this area. In order to optimize the design of the groundwater collection system, this data and data previously collected must be presented in a series of maps, cross sections and tables that will clearly show water table elevations, groundwater flow directions, unsaturated zones, bedrock surface, lithology, and contaminant plumes. These types of visual presentations of the data will be of great benefit in determining where the collection system will need to be placed in order to completely capture contaminated groundwater in this area. Based on these maps, it may be necessary to dog leg the western end of the collection system in a more north-south orientation, so as to collect groundwater that may be flowing into the area from the west.

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Specific Comments

1. Section 4.1 Proposed Action

It is stated here that collection of SW059 water may not be possible for a period of up to one month due to the necessity of decommissioning the existing system prior to the new installation. Construction activities need to be planned so that the period of noncollection is of the minimum duration possible. Temporary methods of collection should also be considered. ✓

2. Table 6 Schedule for Sampling

In order to better evaluate the effectiveness of the treatment system, the sampling frequency of the treatment system influent and effluent should be on a monthly basis for at least months 2 through 6. If during that time, analytical results are consistently acceptable, the remainder of the proposed schedule would be acceptable. ✓

3. Section 4.2 Worker Health and Safety

Since the time that this draft was written, all analytical results of soil samples have been received upon which radiological controls would be based. These results should be presented and the required radiological controls should be stated in this portion of the document. ✓

4. Section 5.5 Flora and Fauna

This section discusses possible impacts to wetlands from changes in groundwater levels resulting from the collection system and/or from construction activities. In order to accurately mitigate these impacts, it is necessary to first conduct a thorough survey of the type and extent of wetlands in the area that could be impacted. This wetland delineation must be completed and submitted prior to the initiation of any construction activities at the site of this action, but need not be part of the decision document. ✓

The Administrative Transfers proposed in Attachment 2 of the OU 2 IM/IRA Modification are acceptable to EPA. However, since this attachment only outlines the general approach that will be taken, formal approval of the modifications to the OU 1 IM/IRA and the OU 2 monitoring obligations will be contingent upon review of the specifics presented in those documents which have not yet been submitted to EPA. ✓

If you have any comments or questions, please contact Gary Kleeman at 312-6246.

Sincerely,

Tim Rehder
Tim Rehder, Manager
Rocky Flats Project



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cc: Norma Castenada DOE
Carl Sprang, CDPRE
Jennifer Uhland, Kaiser-Hill
Gail Hill, DOE



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